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O-027-001

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October 31, 2006

Mr. Paul Krueger WSDOT Environmental Manager 414 Olive Way, Suite 400 Seattle, WA 98101



Seattle, WA 98101 Dear Mr. Krueger,

The National Association for Olmsted Parks would like to express its concern about proposed plans to rebuild the SR 520 bridge across

concern about proposed plans to rebuild the SR 520 bridge across Lake Washington, as depicted in the Draft Environmental Impact Statement (DEIS) currently under review. We find the range of options presented, and the associated environmental review provided, deficient on many counts. On behalf of park and open space advocates across the country, we urge that you consider more appropriate alternatives before irreplaceable resources are lost or damaged beyond repair.

While regional mobility is central to the Seattle area's vitality, so also are those finite cultural and natural resources potentially affected by this project. These include Washington Park Arboretum, Lake Washington Boulevard, Interlaken Boulevard and Park, portions of the University of Washington campus, Mountlake Boulevard, and Ravenna Park and Boulevard. All these are integral features of one of this nation's most complete and best-known park and boulevard systems planned in 1903 by John Charles Olmsted of the venerated Olmsted Brothers landscape architecture firm. Beginning in the mid-19th Century, the firm, founded by Frederick Law Olmsted, designed Central Park in New York City, the U.S. Capitol grounds, and hundreds of parks and parkways, planned communities, campuses, estates and gardens. Working by his side for twenty years was his nephew and stepson John Charles Olmsted who assumed management of the firm after Olmsted Sr.'s retirement.

John Charles Olmsted's plan for Seattle capitalized on the natural and scenic features that set Seattle apart from other cities. He stated, "In designing a system of parks and parkways the primary aim should be to secure and preserve for the use of the people as much as possible of these advantages of water and mountain views and of woodlands, well distributed and conveniently located ..." which continues: 'An ideal system would involve taking all the borders of the different

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**Comment Summary:** 

Section 4(f)

Response:

See Section 21 of the 2006 Draft EIS Comment Response Report.

bodies of water, except such as are needed for commerce." (1903 Olmsted Brothers Report on a Comprehensive System of Parks and Parkways to Board of Park Commissioners of the City of Seattle, adopted Oct 19, 1903.)

0-027-002

According to the DEIS, all plan options for SR 520 disturb and decrease natural shore and wetlands and compromise the integrity of the landmark park system. This is unacceptable. Under Section 4(f) of the National Transportation Act and Section 106 of the National Historic Preservation Act, historic and cultural resources are to be afforded exhaustive consideration when proposing road projects. The DEIS does not demonstrate that such an effort has been made, nor does it appear that serious consideration has been given to alternatives that would have no impact, or a no-build alternative. Surely, Seattle's public parks and parkways deserve such an investigation.

Ironically, Seattle's nationally significant Olmsted Brothers-designed park and boulevard system already bears the brunt of highway construction from an era that predated environmental review laws. The new SR520 can – and must – do better. These parks serve special purposes within the city. They provide recreation, a refuge for wildlife, and give all citizens access to nature and the cleansing influences of air and water. Incompatible uses in or near these special reserves will destroy their healthful advantages and obliterate the legacy bequeathed to Seattle by its city planners generations ago.

0-027-003

NAOP urges the Washington Department of Transportation to view the SR520 as an opportunity to create a visionary and environmentally respectful transportation corridor that enhances Seattle without diminishing its Olmsted legacy.

Sincerely,

David Bahlman Co-Chair Susan West Montgomery
Co-Chair

Cc: Governor Chris Gregoire Mayor Greg Nickels, City of Seattle

Allyson Brooks, Ph.D., State Historic Preservation Officer

### O-027-002

## **Comment Summary:**

Section 106 Process

## Response:

See Section 11.1 of the 2006 Draft EIS Comment Response Report.

### O-027-003

# **Comment Summary:**

Context Sensitive Solutions

### Response:

See Section 10.2 of the 2006 Draft EIS Comment Response Report.